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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SHERMAN WILSON an individual; and REBIKA WILSON, an individual,

Plaintiffs,

vs.

BOBBY C. PRATT, JR., an individual; DOES I through X; and ROE CORPORATIONS XI through XX, inclusive.

Defendants.

Case No: 2:23-cv-01425-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(First Request)**

Defendant BOBBY C. PRATT, JR., and Plaintiffs SHERMAN and REBIKA WILSON, through their respective counsel, submit the foregoing stipulation and order to extend discovery deadlines pursuant to LR 26-4 as follows:

1. Summary of Discovery Completed

To date, the following discovery has been completed in this case:

Item	Date Completed
Plaintiff's Initial Rule 26(a) Disclosures	10/16/2023
Defendant's Initial Rule 26(a) Disclosures	11/07/2023
Defendant's First Set of Interrogatories, Requests for Admission and Requests for Production to Plaintiffs	11/30/2023
Defendant's First Supplemental Rule 26(a) Disclosures	12/05/2023
Plaintiff Sherman Wilson's responses to Defendant's First Set of Interrogatories, Requests for Production and Requests for Admission	01/16/2024
Plaintiff Rebika Wilson's responses to Defendant's	01/16/2024

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Item	Date Completed
First Set of Interrogatories, Requests for Production and Requests for Admission	

2. Discovery Remaining

The following discovery remains to be completed:

- a) Additional Written Discovery;
- b) The deposition of Plaintiff Sherman Wilson has been scheduled for March 21, 2024;
- c) The deposition of Plaintiff Rebika Wilson has been scheduled for March 22, 2024;
- d) Deposition of Defendant;
- e) Deposition(s) of percipient witnesses;
- f) Deposition(s) of treating physicians;
- g) Disclosure of expert witnesses; and
- h) Deposition(s) all expert witnesses.

3. Reason Why Discovery Was Not Completed

Discovery in this matter is currently scheduled to close on June 8, 2024 with initial expert disclosures currently due by March 11, 2024. Although discovery has diligently progressed since the Scheduling Order was filed on November 16, 2023, additional time is required to work through scheduling issues, including anticipated trials, so that discovery may be completed. Discovery has been delayed due to difficulties in scheduling the depositions of Plaintiffs, as Plaintiffs live out of state, and as counsel has had limited time due to trial and trial preparation in other matters. As such, the parties believe that good cause exists to justify extending the discovery deadlines and hereby request a 90 day extension of the discovery deadlines to allow for additional time to complete the remaining discovery.

4. Proposed Schedule for Completing Discovery

Accordingly, the parties respectfully request that this Court enter an order setting the following discovery plan and scheduling order dates:

Event	Former Deadline	New Deadline
Amend pleadings or add parties	March 11, 2024	June 10, 2024
Expert Designations	March 11, 2024	June 10, 2024

1	Rebuttal Expert Designations	April 9, 2024	July 8, 2024
2	Discovery Cut-off	June 8, 2024	Sept. 6, 2024
3	Dispositive Motions	July 8, 2024	October 7, 2024
4	Joint Pre-Trial Order	August 8, 2024	Nov. 6, 2024

5 Counsel further state that the requested extension of discovery deadlines is not interposed for
6 purposes of delay, but rather for the purposes set forth above.

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8 DATED: February 14, 2024

DATED: February 13, 2024

9 **EDWARD M. BERNSTEIN & ASSOCIATES BARRON & PRUITT, LLP**

10 By: /s/ Brian E. Lunt

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17 **IT IS SO ORDERED.**

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19 UNITED STATES MAGISTRATE JUDGE .

20 DATED: 2/16/2024
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